

Mr. Patrick Laux
Thunderbird Products, Inc.
2200 Monroe Street
Decatur, Indiana 46733

Re: **001-11985**
First Administrative Amendment to Incorporate
Significant Source Modification to:
Part 70 Permit No.: T001-5903-00031

Dear Mr. Laux,

Thunderbird Products, Inc. was issued a Part 70 Permit on October 14, 1999 for the operation of their pleasure boat manufacturing and repair operation. A letter requesting that the Significant Source Modification 001-11987 be incorporated into their Part 70 permit was received on March 8, 2000. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (with new language in bold and old language stricken):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.
- (b) Four (4) stationary resin and foam filling booths, identified as, STB1, STB2, STB3, and STB4, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.
- (c) Five (5) IMRON paint spray booths, identified as, SB1, SB2, SB3, SB4, and SB5, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents, #18, #19, #20, #21, and #22.
- (d) Six (6) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, and AV7, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents, #3, #4, #5, #6, #7, and #8.
- (e) **Five (5) stationary booths for gel coating/resin applications, identified as STB7, STB8, STB9, STB10, and STB11, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as control, and each exhausting to stacks/vents #029, #030, #031, #032, and #36 respectively.**
- (f) **Three (3) paint spray booths, identified as SB6, SB7, and SB8, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as control, and each exhausting to stacks/vents #033, #034, and #035, respectively.**

- (g) One (1) assembly, subassembly, upholstery area, with a maximum capacity of processing 0.25 boat units per hour, and exhausting to the atmosphere.**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) *Natural gas-fired combustion sources (fourteen space heaters H1 through H14 and two (2) gel spray booth heaters, SBH1 and SBH2) with heat input equal to or less than 10 MMBtu per hour each.*
- (b) Eight (8) storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons.
- (c) Cleaners and solvents characterized as follows: a) having a vapor pressure equal to or less than 2.0 kPa measured at 38 degrees C or b) having a vapor pressure equal to or less than 0.7 kPa measured at 20 degrees C.
- (d) Brazing, cutting, soldering, welding equipment and activities not resulting in HAPs emissions.
- (e) Two Acetone recovery systems T4 and T6 with batch capacity less than 100 gallons.
- (f) Water bases adhesives that are less than 5% by volume of VOCs excluding HAPs.
- (g) Cut/trim, grinding, machining and wood working equipment and controlled with baghouses BH1 and BH2.
- (h) Other categories with emissions below insignificant thresholds:
 - (1) A wood/plastic working shop identified as BH3, equipped with one (1) baghouse for particulate control, with 99.95% efficiency and exhausting to stack/vent, #17.
 - (2) Activities related to research and development with VOC emissions below 15 pounds per day.
 - (3) Return services limited to minor patching with gel resin, paint touch-up.
 - ~~(4) Assembly/subassembly operations using various adhesives fillers and other sealing type materials.~~
 - ~~(4)(5)~~ Boat cavity foam filling operations.
- (i) **Paved and unpaved roads and parking lots with public access.**

Facility Description [326 IAC 2-7-5(15)]

- a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of 0.13 boats per hour per booth using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.
- b) Four (4) stationary resin and foam filling booths, identified as STB1, STB2, STB3, and STB4, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.
- c) Five (5) IMRON paint spray booths, identified as SB1, SB2, SB3, SB4, and SB5, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #18, #19, #20, #21, and #22.
- d) Six (6) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, and AV7, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #3, #4, #5, #6, #7, and #8.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]

Pursuant to the construction permit CP (01) 1658 issued in October 20, 1987, this source is subject to BACT requirements for VOC emissions. The current BACT requirements for fiberglass operations have been determined to be similar to the MACT determination under 326 IAC 2-1-3.4. Therefore, pursuant to the MACT determination under 326 IAC 2-1-3.4 and Construction Permit CP (01) 1658 issued in October 20, 1987, operating conditions for the fiberglass and painting operations shall be the following:

- (a) Monthly usage by weight, volatile organic content, method of application, and other emission reduction techniques for each gel coat, resin, and paint shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.
Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.

- (c) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$\frac{(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat})}{(\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and/or other emission reduction techniques})}$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel coat used, %);

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (d) Flow coatlers, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:
- (1) to apply 50% of all neat resins within 6 months of commencement of operation.

(2) to apply 100% of all neat resins used within 1 year of commencement of operation.

If after 1 year of operation it is not possible to apply a portion of neat resins with flow coatlers, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in Condition D.1.1(c) above, elsewhere in the process.

- (e) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (f) The listed work practices shall be followed:
- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- ~~(a)~~ Pursuant to PC (01) 1658, issued on October 20, 1987, the entire ~~facility~~ **source** shall be limited to less than ~~20.83~~ **250** tons of VOC emissions per **twelve consecutive** month period rolled on a monthly basis. **This limitation includes equipment listed in sections D.1 D.2 and D.3. Compliance with this condition shall be based on the conditions of D.1.1 (a) and (b).**

Any change or modification which may increase source wide VOC emissions to 250 tons per 12 consecutive month period, or greater, shall require OAM approval before such change can take place.

- ~~(b)~~ Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compound emission limit established in Condition D.1.2.
- (1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the monthly usage;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;

- (4) The calculated total volatile organic compound emissions from resin and gel coat use for each month.
- (b) To document compliance with Conditions ~~D.1.5~~ **D.1.8**, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily ~~visible emission notations of the fiberglass operations' stack exhaust~~ **inspections of the filters, weekly observation of the overspray from the surface coating booth stacks, and monthly inspections of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground..**
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition ~~D.1.4~~ **D.1.2** (a) and (b) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- a) Five (5) gel/resin coating stationary booths, identified as STB7, STB8, STB9, STB10 and STB11, with a maximum capacity of 0.025 boats per hour per booth using dry filters as particulate matter overspray control, and each exhausting to stacks/vents 029, 030, 031, 032, and 036, respectively;
- b) Three (3) paint spray booths, identified as SB6, SB7 and SB8, with a maximum capacity of 0.025 boat units per hour per booth, using dry filters as particulate matter overspray control, and each exhausting to stacks/vents 033, 034, and 035, respectively.

(The information describing the processes contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the New Source Toxics Control under 326 IAC2-4.1-1, operating conditions for the five (5) new gel coating/resin stationary booths, identified as STB7, STB8, STB9, STB10, and STB11 are listed below. Adherence to these conditions will also satisfy 326 IAC 8-1-6 (BACT).

- (a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the total combined hazardous air pollutant (HAP) emissions are limited to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based

upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(b)Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.

- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins and gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.**

The use of resins and gel coats with monomer contents lower than 35%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins and gel coats with monomer contents higher than 35%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from >35% resin or gel coat) - (Emissions from 35% resin or gel coat) ≤ (Emissions from 35% resin or gel coat) - (Emissions from <35% resin or gel coat, and or other emission reduction techniques).

**Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF
(Monomer emission factor for resin or gel cat used, %):**

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) **Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used.**

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in (b) above, elsewhere in the process.

- (d) **Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.**

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) **The listed work practices shall be followed:**

(1)To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2)Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

(3)Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4)The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(5)All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(6)Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PC (01) 1658, issued on October 20, 1987, the entire source shall be limited to less than 250 tons of VOC emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1, D.2 and D.3. Compliance with this condition shall be based on the conditions of D.2.1 (a) and (b).

Any change or modification which may increase VOC usage to 250 tons per 12 consecutive month period, or greater, shall require OAM approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) from the paint spray booths and stationary booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.4 New Facilities: General Reduction Requirements [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from the paint booths (SB6, SB7 and SB8) to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in D.2.2, PM limits specified in D.2.3. and HAPs limits specified in D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 HAP Emissions

Compliance with Condition D.2.1(a) shall be demonstrated within 30 days of at the end of each month based on the total hazardous air pollutant emissions for the most recent twelve (12) month period.

D.2.9 VOC Emissions

Compliance with Condition D.2.2 shall be demonstrated within 30 days of at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.10 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the nine (9) booths identified as STB7, STB8, STB9, STB10, STB11, SB6, SB7, and SB8 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with STB7, STB8, STB9, STB10, STB11, SB6, SB7, and SB8, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response

step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the hazardous air pollution (HAP) emission limit established in Condition D.2.1.**
- (1) The usage by weight and monomer content of each resin, gel coat, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;**
 - (2) A log of the month of use;**
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;**
 - (4) The individual HAP and combined HAP usage for each month; and**
 - (5) The weight of individual HAP and combined HAPs emitted for each compliance period.**
- (b) To document compliance with Conditions D.2.2 and D.2.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.2 and D.2.4.**
- (1) The amount, and the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
 - (2) A log of the month(s) of use;**
 - (3) The cleanup solvent usage for each month;**
 - (4) The total VOC usage for each month; and**
 - (5) The weight of VOCs emitted for each compliance period.**

- (c) To document compliance with Conditions D.2.3 and D.2.10, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- a) One (1) assembly, subassembly, upholstery area, processing a maximum of 0.25 boat units per hour, and exhausting to four (4) vents, identified as #037, #038, #039, and #040.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the source shall comply with the following best available control technology (BACT) determination:

- (a) The VOC content of the adhesives and sealants applied shall not exceed 9.5 pounds per gallon less water;
- (b) The total VOC input to the assembly, subassembly, upholstery area operations, including any cleanup solvents, shall not exceed 55.9 tons per twelve (12) consecutive month period.
- (c) Proper equipment cleanup and maintenance shall be performed, including containment of any solvent used during equipment cleanup. Such containers shall be closed as soon as cleanup is complete, and any waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PC (01) 1658, issued on October 20, 1987, the entire source shall be limited to less than 250 tons of VOC emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1, D.2 and D.3. Compliance with this condition shall be based on the conditions of D.3.1 (a) and (b).

Any change or modification which may increase VOC usage to 250 tons per 12 consecutive month period, or greater, shall require OAM approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.6 VOC Emissions

Compliance with Conditions D.3.1 and D.3.2 shall be demonstrated within 30 days of at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.2.
- (1) The amount, and the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the month(s) of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Thunderbird Products, Inc.
Decatur, Indiana
Permit Reviewer: Keramida/VS

First Administrative Amendment 001-11985
Amended by: LQ / EVP

Page 15 of 19
OP No.T001-5903-00031

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Thunderbird Products, Inc.
Source Address: 2200 Monroe Street, Decatur, Indiana 46733
Mailing Address: 2200 Monroe Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-5903-00031
Facility: entire source including the following booths: GSB4, GSB5, GSB6, AV2, AV3, AV4, AV4, AV5, AV6, AV7, STB1, STB2, STB3, STB4, STB5, STB8, STB9, STB10, STB11, SB1, SB2, SB3, SB4, SB5, SB6, SB7, SB8, and assembly, subassembly, upholstery area.
Parameter: VOC
Limit: less than 250 tons per twelve (12) consecutive month period
(a) When applying gel coats and resins, VOC emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
(c) When applying VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

- 9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Thunderbird Products, Inc.

Source Address: 2200 Monroe Street, Decatur, IN 46733

Mailing Address: 2200 Monroe Street, Decatur, IN 46733

Part 70 Permit No.: T0015903-00031

Facility: STB7, STB8, STB9, STB10 and STB11

Parameter: Single and Combined Hazardous Air Pollutants (HAPs)

The hazardous air pollutant (HAP) input usage shall be limited such that total combined HAP emissions are limited to less than 100 tons per twelve (12) consecutive month period based on the following:

- (a) When applying gel coats and resins, hazardous air pollutant (HAPs) emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
- (c) When applying hazardous air pollutants (HAPs) solvents other than gel coats and resins, hazardous air pollutants (HAPs) emissions shall be calculated using an emission factor of 2,000 pounds of hazardous air pollutants (HAPs) emitted per ton of VOC used.

YEAR: _____

| Month | Combined HAPs Emitted This Month (tons) | | Combined HAPs Emitted Previous 11 Months (tons) | | Combined HAPs Emitted 12 Month Total (tons) | |
|---------|--|--|--|--|--|--|
| Month 1 | | | | | | |
| Month 2 | | | | | | |
| Month 3 | | | | | | |

- 9 No deviation occurred in this quarter.
- 9 Deviation(s) occurred in this quarter.
- 9 Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report.

The permit cover page and table of contents will also be updated to include the above referenced information. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

Operation of the new equipment incorporated into the Part 70 operating permit by this amendment may commence upon issuance of this approval. This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Linda Quigley, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3284 or dial (800) 451-6027, press 0 and ask for 3-6878.

Sincerely,

Paul Dubenetzky, Chief

Permits Branch

Office of Air Management

Attachments

LQ / EVP

cc: File - Adams County
U.S. EPA, Region V
Adams County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Thunderbird Products, Inc.
2200 Monroe Street
Decatur, Indiana 46733**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|---|---------------------------------|
| Operation Permit No.: T001-5903-00031 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management | Issuance Date: October 14, 1999 |

| | |
|---|--|
| First Administrative Amendment: 001-11985-00031 | Pages Affected: 2, 3, 3a, 4, 5, 27 - 31, 31a - 31j |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: |

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)] [326 IAC 2-7-6(1)and(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.9 Compliance Schedule [326 IAC 2-7-6(3)]
- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- C.12 Monitoring Methods [326 IAC 3]
- C.13 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- D.1 FACILITY OPERATION CONDITIONS** - four stationary booths (STB1, STB2, STB3 and STB4), five paint spray booths (SB1, SB2, SB3, SB4 and SB5), three gel coating booths (GSB4, GSB5, and GSB6) and six lamination areas (AV2, AV3, AV4, AV5, AV6, and AV7)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]
- D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

Compliance Determination Requirements

- D.1.5 Testing Requirements [326 IAC 2-7-6(1)]
- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 VOC Emissions
- D.1.8 Particulate Matter

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.9 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

- D.2 FACILITY OPERATION CONDITIONS** - Five (5) stationary booths, three (3) paint spray booths

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]
- D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.2.4 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]
- D.2.5 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

Compliance Determination Requirements

- D.2.6 Testing Requirements [326 IAC 2-7-6(1)]
- D.2.7 Volatile Organic Compounds (VOC)
- D.2.8 HAP Emissions
- D.2.9 VOC Emissions
- D.2.10 Particulate Matter

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.11 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Record Keeping Requirements

D.2.13 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS One (1) assembly, subassembly, upholstery area

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]

D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1)]

D.3.5 Volatile Organic Compounds (VOC)

D.3.6 VOC Emissions

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

D.3.8 Reporting Requirements

Certification Form

Emergency/Deviation Form

Quarterly Report Form

Quarterly Compliance Report Forms

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a source constructed in 1987 and manufactures fiberglass pleasure boats. The process involves fiberglass lamination, gel coating, wood/plastic working, assembly and spray painting.

Responsible Official: Jim Laux
Source Address: 2200 Monroe Street, Decatur, IN 46733
Mailing Address: 2200 Monroe Street, Decatur, IN 46733
Phone Number: (219) 724-9111
SIC Code: 3732 - Boat building
County Location: Adams
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD or Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.
- (b) Four (4) stationary resin and foam filling booths, identified as, STB1, STB2, STB3, and STB4, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.
- (c) Five (5) IMRON paint spray booths, identified as, SB1, SB2, SB3, SB4, and SB5, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents, #18, #19, #20, #21, and #22.
- (d) Six (6) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, and AV7, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents, #3, #4, #5, #6, #7, and #8.
- (e) Five (5) gel coating/resin stationary booths, identified as STB7, STB8, STB9, STB10 and STB11, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as particulate matter overspray control, and each exhausting to stacks/vents #029, #030, #031, #032 and #036, respectively.
- (f) Three (3) paint spray booths, identified as SB6, SB7, and SB8, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as particulate matter overspray control, and each exhausting to stacks/vents #033, #034, and #035, respectively.

- (g) One (1) assembly, subassembly, upholstery area, processing a maximum of 0.25 boat units per hour, and exhausting to four (4) vents, identified as #037, #038, #039, and #040.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources (fourteen space heaters H1 through H14 and two (2) gel spray booth heaters, SBH1 and SBH2) with heat input equal to or less than 10 MMBtu per hour each.
- (b) Eight (8) storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons.
- (c) Cleaners and solvents characterized as follows: a) having a vapor pressure equal to or less than 2.0 kPa measured at 38 degrees C or b) having a vapor pressure equal to or less than 0.7 kPa measured at 20 degrees C.
- (d) Brazing, cutting, soldering, welding equipment and activities not resulting in HAPs emissions.
- (e) Two acetone recovery systems T4 and T6 with batch capacity less than 100 gallons.
- (f) Water bases adhesives that are less than 5% by volume of VOCs excluding HAPs.
- (g) Cut/trim, grinding, machining and wood working equipment and controlled with baghouses BH1 and BH2.
- (h) Other categories with emissions below insignificant thresholds:
 - (1) A wood/plastic working shop identified as BH3, equipped with one (1) baghouse for particulate control, with 99.95% efficiency and exhausting to stack/vent, #17.
 - (2) Activities related to research and development with VOC emissions below 15 pounds per day.
 - (3) Return services limited to minor patching with gel resin, paint touch-up.
 - (4) Boat cavity foam filling operations.
- (i) Paved and unpaved roads and parking lots with public access.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (USEPA) under 40 CFR 70.3 (Part 70 Applicability).

Facility Description [326 IAC 2-7-5(15)]

- a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of 0.13 boats per hour per booth using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.
- b) Four (4) stationary resin and foam filling booths, identified as STB1, STB2, STB3, and STB4, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.
- c) Five (5) IMRON paint spray booths, identified as SB1, SB2, SB3, SB4, and SB5, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #18, #19, #20, #21, and #22.
- d) Six (6) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, and AV7, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #3, #4, #5, #6, #7, and #8.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]

Pursuant to the construction permit CP (01) 1658 issued in October 20, 1987, this source is subject to BACT requirements for VOC emissions. The current BACT requirements for fiberglass operations have been determined to be similar to the MACT determination under 326 IAC 2-1-3.4. Therefore, pursuant to the MACT determination under 326 IAC 2-1-3.4 and Construction Permit CP (01) 1658 issued in October 20, 1987, operating conditions for the fiberglass and painting operations shall be the following:

- (a) Monthly usage by weight, volatile organic content, method of application, and other emission reduction techniques for each gel coat, resin, and paint shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
- (c) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$\frac{(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat})}{(\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and/or other emission reduction techniques})}$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel coat used, %);

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (d) Flow coatlers, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:

- (1) to apply 50% of all neat resins within 6 months of commencement of operation.
- (2) to apply 100% of all neat resins used within 1 year of commencement of operation.

If after 1 year of operation it is not possible to apply a portion of neat resins with flow coatlers, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in Condition D.1.1(c) above, elsewhere in the process.

- (e) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (f) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PC (01) 1658, issued on October 20, 1987, the entire source shall be limited to less than 250 tons of VOC emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1, D.2 and D.3. Compliance with this condition shall be based on the conditions of D.1.1 (a) and (b).

Any change or modification which may increase source wide VOC emissions to 250 tons per 12 consecutive month period, or greater, shall require OAM approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to PC (01) 1658, issued on October 20 1987, the PM from the nine (9) booths identified as STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Conditions D.1.3. shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Particulate Matter (PM)

Pursuant to PC (01) 1658 issued in October 20, 1987, the dry filters for PM control shall be in operation at all times when these nine (9) booths identified as STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compound emission limit established in Condition D.1.2.
 - (1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the monthly usage;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total volatile organic compound emissions from resin and gel coat use for each month.
- (b) To document compliance with Conditions D.1.8, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily inspections of the filters, weekly observation of the overspray from the surface coating booth stacks, and monthly inspections of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit..

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 (a) and (b) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- a) Five (5) gel/resin coating stationary booths, identified as STB7, STB8, STB9, STB10, and STB11, each with a maximum capacity of 0.025 boats per hour, each using dry filters as particulate matter overspray control, and each exhausting to stacks/vents 029, 030, 031, 032, and 036, respectively;
 - b) Three (3) paint spray booths, identified as SB6, SB7 and SB8, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as particulate matter overspray control, and each exhausting to stacks/vents 033, 034, and 035, respectively.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the New Source Toxics Control under 326 IAC 2-4.1-1, operating conditions for the five (5) new gel coating/resin stationary booths, identified as STB7, STB8, STB9, STB10, and STB11 are listed below. Adherence to these conditions will also satisfy 326 IAC 8-1-6 (BACT).

- (a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the total combined hazardous air pollutant (HAP) emissions are limited to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.

- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins and gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins and gel coats with monomer contents lower than 35%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins and gel coats with monomer contents higher than 35%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$(\text{Emissions from } >35\% \text{ resin or gel coat}) - (\text{Emissions from } 35\% \text{ resin or gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or gel coat}) - (\text{Emissions from } <35\% \text{ resin or gel coat, and other emission reduction techniques}).$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF
(Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PC (01) 1658, issued on October 20, 1987, the entire source shall be limited to less than 250 tons of VOC emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1, D.2 and D.3. Compliance with this condition shall be based on the conditions of D.2.1 (a) and (b).

Any change or modification which may increase VOC usage to 250 tons per 12 consecutive month period, or greater, shall require OAM approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) from the paint spray booths and stationary booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.4 New Facilities: General Reduction Requirements [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from the paint booths (SB6, SB7 and SB8) to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in D.2.2, PM limits specified in D.2.3. and HAPs limits specified in D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 HAP Emissions

Compliance with Condition D.2.1(a) shall be demonstrated within 30 days of at the end of each month based on the total hazardous air pollutant emissions for the most recent twelve (12) month period.

D.2.9 VOC Emissions

Compliance with Condition D.2.2 shall be demonstrated within 30 days of at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.10 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the nine (9) booths identified as STB7, STB8, STB9, STB10, STB11, SB6, SB7, and SB8 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with STB7, STB8, STB9, STB10, STB11, SB6, SB7, and SB8, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the hazardous air pollution (HAP) emission limit established in Condition D.2.1.
 - (1) The usage by weight and monomer content of each resin, gel coat, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the month of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The individual HAP and combined HAP usage for each month; and
 - (5) The weight of individual HAP and combined HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.2 and D.2.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.2 and D.2.4.
 - (1) The amount, and the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the month(s) of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.2.3 and D.2.10, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- a) One (1) assembly, subassembly, upholstery area, processing a maximum of 0.25 boat units per hour, and exhausting to four (4) vents, identified as #037, #038, #039, and #040.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the source shall comply with the following best available control technology (BACT) determination:

- (a) The VOC content of the adhesives and sealants applied shall not exceed 9.5 pounds per gallon less water;
- (b) The total VOC input to the assembly, subassembly, upholstery area operations, including any cleanup solvents, shall not exceed 55.9 tons per twelve (12) consecutive month period.
- (c) Proper equipment cleanup and maintenance shall be performed, including containment of any solvent used during equipment cleanup. Such containers shall be closed as soon as cleanup is complete, and any waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PC (01) 1658, issued on October 20, 1987, the entire source shall be limited to less than 250 tons of VOC emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1, D.2 and D.3. Compliance with this condition shall be based on the conditions of D.3.1 (a) and (b).

Any change or modification which may increase VOC usage to 250 tons per 12 consecutive month period, or greater, shall require OAM approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.6 VOC Emissions

Compliance with Conditions D.3.1 and D.3.2 shall be demonstrated within 30 days of at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.2.
 - (1) The amount, and the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the month(s) of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Thunderbird Products, Inc.
Source Address: 2200 Monroe Street, Decatur, Indiana 46733
Mailing Address: 2200 Monroe Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-5903-00031
Facility: entire source including the following booths: GSB4, GSB5, GSB6, AV2, AV3, AV4, AV4, AV5, AV6, AV7, STB1, STB2, STB3, STB4, STB5, STB8, STB9, STB10, STB11, SB1, SB2, SB3, SB4, SB5, SB6, SB7, SB8, and assembly, subassembly, upholstery area.
Parameter: VOC
Limit: less than 250 tons per twelve (12) consecutive month period
(a) When applying gel coats and resins, VOC emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
(c) When applying VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

- 9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Thunderbird Products, Inc.

Source Address: 2200 Monroe Street, Decatur, IN 46733

Mailing Address: 2200 Monroe Street, Decatur, IN 46733

Part 70 Permit No.: T0015903-00031

Facility: STB7, STB8, STB9, STB10 and STB11

Parameter: Single and Combined Hazardous Air Pollutants (HAPs)

The hazardous air pollutant (HAP) input usage shall be limited such that total combined HAP emissions are limited to less than 100 tons per twelve (12) consecutive month period based on the following:

- (a) When applying gel coats and resins, hazardous air pollutant (HAPs) emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
- (c) When applying hazardous air pollutants (HAPs) solvents other than gel coats and resins, hazardous air pollutants (HAPs) emissions shall be calculated using an emission factor of 2,000 pounds of hazardous air pollutants (HAPs) emitted per ton of VOC used.

YEAR: _____

| Month | Combined HAPs Emitted This Month (tons) | | Combined HAPs Emitted Previous 11 Months (tons) | | Combined HAPs Emitted 12 Month Total (tons) | |
|---------|--|--|--|--|--|--|
| Month 1 | | | | | | |
| Month 2 | | | | | | |
| Month 3 | | | | | | |

- 9 No deviation occurred in this quarter.
- 9 Deviation(s) occurred in this quarter.
- 9 Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report.

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Thunderbird Products, Inc.
2200 Monroe Street
Decatur, Indiana 46733**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|---|---------------------------------|
| Operation Permit No.: T001-5903-00031 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management | Issuance Date: October 14, 1999 |

| | |
|---|--|
| First Administrative Amendment: 001-11985-00031 | Pages Affected: 2, 3, 3a, 4, 5, 27 - 31, 31a - 31j |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: |

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)] [326 IAC 2-7-6(1)and(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.9 Compliance Schedule [326 IAC 2-7-6(3)]
- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- C.12 Monitoring Methods [326 IAC 3]
- C.13 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- D.1 FACILITY OPERATION CONDITIONS** - four stationary booths (STB1, STB2, STB3 and STB4), five paint spray booths (SB1, SB2, SB3, SB4 and SB5), three gel coating booths (GSB4, GSB5, and GSB6) and six lamination areas (AV2, AV3, AV4, AV5, AV6, and AV7)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]
- D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

Compliance Determination Requirements

- D.1.5 Testing Requirements [326 IAC 2-7-6(1)]
- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 VOC Emissions
- D.1.8 Particulate Matter

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.9 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

- D.2 FACILITY OPERATION CONDITIONS** - Five (5) stationary booths, three (3) paint spray booths

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]
- D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.2.4 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]
- D.2.5 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

Compliance Determination Requirements

- D.2.6 Testing Requirements [326 IAC 2-7-6(1)]
- D.2.7 Volatile Organic Compounds (VOC)
- D.2.8 HAP Emissions
- D.2.9 VOC Emissions
- D.2.10 Particulate Matter

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.11 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Record Keeping Requirements

D.2.13 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS One (1) assembly, subassembly, upholstery area

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]

D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1)]

D.3.5 Volatile Organic Compounds (VOC)

D.3.6 VOC Emissions

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

D.3.8 Reporting Requirements

Certification Form

Emergency/Deviation Form

Quarterly Report Form

Quarterly Compliance Report Forms

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a source constructed in 1987 and manufactures fiberglass pleasure boats. The process involves fiberglass lamination, gel coating, wood/plastic working, assembly and spray painting.

Responsible Official: Jim Laux
Source Address: 2200 Monroe Street, Decatur, IN 46733
Mailing Address: 2200 Monroe Street, Decatur, IN 46733
Phone Number: (219) 724-9111
SIC Code: 3732 - Boat building
County Location: Adams
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD or Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.
- (b) Four (4) stationary resin and foam filling booths, identified as, STB1, STB2, STB3, and STB4, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.
- (c) Five (5) IMRON paint spray booths, identified as, SB1, SB2, SB3, SB4, and SB5, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents, #18, #19, #20, #21, and #22.
- (d) Six (6) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, and AV7, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents, #3, #4, #5, #6, #7, and #8.
- (e) Five (5) gel coating/resin stationary booths, identified as STB7, STB8, STB9, STB10 and STB11, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as particulate matter overspray control, and each exhausting to stacks/vents #029, #030, #031, #032 and #036, respectively.
- (f) Three (3) paint spray booths, identified as SB6, SB7, and SB8, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as particulate matter overspray control, and each exhausting to stacks/vents #033, #034, and #035, respectively.

- (g) One (1) assembly, subassembly, upholstery area, processing a maximum of 0.25 boat units per hour, and exhausting to four (4) vents, identified as #037, #038, #039, and #040.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources (fourteen space heaters H1 through H14 and two (2) gel spray booth heaters, SBH1 and SBH2) with heat input equal to or less than 10 MMBtu per hour each.
- (b) Eight (8) storage tanks with capacity less than or equal to 1000 gallons and annual throughput less than 12,000 gallons.
- (c) Cleaners and solvents characterized as follows: a) having a vapor pressure equal to or less than 2.0 kPa measured at 38 degrees C or b) having a vapor pressure equal to or less than 0.7 kPa measured at 20 degrees C.
- (d) Brazing, cutting, soldering, welding equipment and activities not resulting in HAPs emissions.
- (e) Two acetone recovery systems T4 and T6 with batch capacity less than 100 gallons.
- (f) Water bases adhesives that are less than 5% by volume of VOCs excluding HAPs.
- (g) Cut/trim, grinding, machining and wood working equipment and controlled with baghouses BH1 and BH2.
- (h) Other categories with emissions below insignificant thresholds:
 - (1) A wood/plastic working shop identified as BH3, equipped with one (1) baghouse for particulate control, with 99.95% efficiency and exhausting to stack/vent, #17.
 - (2) Activities related to research and development with VOC emissions below 15 pounds per day.
 - (3) Return services limited to minor patching with gel resin, paint touch-up.
 - (4) Boat cavity foam filling operations.
- (i) Paved and unpaved roads and parking lots with public access.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (USEPA) under 40 CFR 70.3 (Part 70 Applicability).

Facility Description [326 IAC 2-7-5(15)]

- a) Three (3) gel coating booths, identified as GSB4, GSB5, and GSB6, with a maximum capacity of 0.13 boats per hour per booth using dry filters as control, and exhausting to stacks/vents #10, #11, and #12.
- b) Four (4) stationary resin and foam filling booths, identified as STB1, STB2, STB3, and STB4, with a maximum capacity of 0.005 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #13, #14, #15, and #16.
- c) Five (5) IMRON paint spray booths, identified as SB1, SB2, SB3, SB4, and SB5, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #18, #19, #20, #21, and #22.
- d) Six (6) lamination and foam filling areas, identified as: AV2, AV3, AV4, AV5, AV6, and AV7, with a maximum capacity of 0.13 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents #3, #4, #5, #6, #7, and #8.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]

Pursuant to the construction permit CP (01) 1658 issued in October 20, 1987, this source is subject to BACT requirements for VOC emissions. The current BACT requirements for fiberglass operations have been determined to be similar to the MACT determination under 326 IAC 2-1-3.4. Therefore, pursuant to the MACT determination under 326 IAC 2-1-3.4 and Construction Permit CP (01) 1658 issued in October 20, 1987, operating conditions for the fiberglass and painting operations shall be the following:

- (a) Monthly usage by weight, volatile organic content, method of application, and other emission reduction techniques for each gel coat, resin, and paint shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
- (c) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins with monomer contents lower than 35%, gel coats with monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with monomer contents higher than 35%, and/or gel coats with monomer contents higher than 37%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$\frac{(\text{Emissions from } >35\% \text{ resin or } >37\% \text{ gel coat}) - (\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat})}{(\text{Emissions from } 35\% \text{ resin or } 37\% \text{ gel coat}) - (\text{Emissions from } <35\% \text{ resin, } <37\% \text{ gel coat, and/or other emission reduction techniques})}$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (Monomer emission factor for resin or gel coat used, %);

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (d) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used in the following manner:

- (1) to apply 50% of all neat resins within 6 months of commencement of operation.
- (2) to apply 100% of all neat resins used within 1 year of commencement of operation.

If after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in Condition D.1.1(c) above, elsewhere in the process.

- (e) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (f) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized, and managed in accordance with applicable solid or hazardous waste requirements.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PC (01) 1658, issued on October 20, 1987, the entire source shall be limited to less than 250 tons of VOC emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1, D.2 and D.3. Compliance with this condition shall be based on the conditions of D.1.1 (a) and (b).

Any change or modification which may increase source wide VOC emissions to 250 tons per 12 consecutive month period, or greater, shall require OAM approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to PC (01) 1658, issued on October 20 1987, the PM from the nine (9) booths identified as STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Conditions D.1.3. shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Particulate Matter (PM)

Pursuant to PC (01) 1658 issued in October 20, 1987, the dry filters for PM control shall be in operation at all times when these nine (9) booths identified as STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with STB1, STB2, STB3, STB4, SB1, SB2, SB3, SB4, and SB5, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compound emission limit established in Condition D.1.2.
 - (1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the monthly usage;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The calculated total volatile organic compound emissions from resin and gel coat use for each month.
- (b) To document compliance with Conditions D.1.8, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily inspections of the filters, weekly observation of the overspray from the surface coating booth stacks, and monthly inspections of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit..

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 (a) and (b) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- a) Five (5) gel/resin coating stationary booths, identified as STB7, STB8, STB9, STB10, and STB11, each with a maximum capacity of 0.025 boats per hour, each using dry filters as particulate matter overspray control, and each exhausting to stacks/vents 029, 030, 031, 032, and 036, respectively;
 - b) Three (3) paint spray booths, identified as SB6, SB7 and SB8, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as particulate matter overspray control, and each exhausting to stacks/vents 033, 034, and 035, respectively.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the New Source Toxics Control under 326 IAC 2-4.1-1, operating conditions for the five (5) new gel coating/resin stationary booths, identified as STB7, STB8, STB9, STB10, and STB11 are listed below. Adherence to these conditions will also satisfy 326 IAC 8-1-6 (BACT).

- (a) Use of resins, gel coats and clean-up solvents, as well as VOC delivered to the applicators, shall be limited such that the total combined hazardous air pollutant (HAP) emissions are limited to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
 - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998, or its update, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.

- (b) Resins and gel coats used, including filled resins and tooling resins and gel coats, shall be limited to maximum monomer contents of 35 percent (35%) by weight for resins and gel coats or their equivalent on an emissions mass basis. Monomer contents shall be calculated on a neat basis, i.e., excluding any filler. Compliance with these monomer content limits shall be demonstrated on a monthly basis.

The use of resins and gel coats with monomer contents lower than 35%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins and gel coats with monomer contents higher than 35%. Examples of other techniques include, but are not limited to, lower monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging, controlled spraying, or installing a control device with an overall reduction efficiency of 95%. This is allowed to meet the monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

$$(\text{Emissions from } >35\% \text{ resin or gel coat}) - (\text{Emissions from } 35\% \text{ resin or gel coat}) \leq (\text{Emissions from } 35\% \text{ resin or gel coat}) - (\text{Emissions from } <35\% \text{ resin or gel coat, and other emission reduction techniques}).$$

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF
(Monomer emission factor for resin or gel cat used, %):

EF, Monomer emission factor = emission factor, expressed as % styrene emitted per weight of resin applied, which is indicated by the monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (c) Flow coaters, a type of non-spray application technology of a design and specifications to be approved by IDEM, OAM, shall be used.

If, after 1 year of operation it is not possible to apply a portion of neat resins with flow coaters, equivalent emissions reductions must be obtained via use of other techniques, such as those listed in (b) above, elsewhere in the process.

- (d) Optimized spray techniques according to a manner approved by IDEM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of coating application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (e) The listed work practices shall be followed:

- (1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.
- (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.

- (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (5) All solvent sprayed during cleanup or resin changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (6) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PC (01) 1658, issued on October 20, 1987, the entire source shall be limited to less than 250 tons of VOC emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1, D.2 and D.3. Compliance with this condition shall be based on the conditions of D.2.1 (a) and (b).

Any change or modification which may increase VOC usage to 250 tons per 12 consecutive month period, or greater, shall require OAM approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) from the paint spray booths and stationary booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.4 New Facilities: General Reduction Requirements [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from the paint booths (SB6, SB7 and SB8) to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in D.2.2, PM limits specified in D.2.3. and HAPs limits specified in D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 HAP Emissions

Compliance with Condition D.2.1(a) shall be demonstrated within 30 days of at the end of each month based on the total hazardous air pollutant emissions for the most recent twelve (12) month period.

D.2.9 VOC Emissions

Compliance with Condition D.2.2 shall be demonstrated within 30 days of at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.10 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the nine (9) booths identified as STB7, STB8, STB9, STB10, STB11, SB6, SB7, and SB8 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks associated with STB7, STB8, STB9, STB10, STB11, SB6, SB7, and SB8, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the hazardous air pollution (HAP) emission limit established in Condition D.2.1.
 - (1) The usage by weight and monomer content of each resin, gel coat, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the month of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) The individual HAP and combined HAP usage for each month; and
 - (5) The weight of individual HAP and combined HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.2 and D.2.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.2 and D.2.4.
 - (1) The amount, and the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the month(s) of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.2.3 and D.2.10, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- a) One (1) assembly, subassembly, upholstery area, processing a maximum of 0.25 boat units per hour, and exhausting to four (4) vents, identified as #037, #038, #039, and #040.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) - General Reduction [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the source shall comply with the following best available control technology (BACT) determination:

- (a) The VOC content of the adhesives and sealants applied shall not exceed 9.5 pounds per gallon less water;
- (b) The total VOC input to the assembly, subassembly, upholstery area operations, including any cleanup solvents, shall not exceed 55.9 tons per twelve (12) consecutive month period.
- (c) Proper equipment cleanup and maintenance shall be performed, including containment of any solvent used during equipment cleanup. Such containers shall be closed as soon as cleanup is complete, and any waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PC (01) 1658, issued on October 20, 1987, the entire source shall be limited to less than 250 tons of VOC emissions per twelve consecutive month period. This limitation includes equipment listed in sections D.1, D.2 and D.3. Compliance with this condition shall be based on the conditions of D.3.1 (a) and (b).

Any change or modification which may increase VOC usage to 250 tons per 12 consecutive month period, or greater, shall require OAM approval before such change can take place.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.6 VOC Emissions

Compliance with Conditions D.3.1 and D.3.2 shall be demonstrated within 30 days of at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.2.
 - (1) The amount, and the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the month(s) of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Thunderbird Products, Inc.
Source Address: 2200 Monroe Street, Decatur, Indiana 46733
Mailing Address: 2200 Monroe Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-5903-00031
Facility: entire source including the following booths: GSB4, GSB5, GSB6, AV2, AV3, AV4, AV4, AV5, AV6, AV7, STB1, STB2, STB3, STB4, STB5, STB8, STB9, STB10, STB11, SB1, SB2, SB3, SB4, SB5, SB6, SB7, SB8, and assembly, subassembly, upholstery area.
Parameter: VOC
Limit: less than 250 tons per twelve (12) consecutive month period
(a) When applying gel coats and resins, VOC emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
(b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
(c) When applying VOC solvents other than gel coats and resins, VOC emissions shall be calculated using an emission factor of 2,000 pounds of VOC emitted per ton of VOC used.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

- 9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Thunderbird Products, Inc.

Source Address: 2200 Monroe Street, Decatur, IN 46733

Mailing Address: 2200 Monroe Street, Decatur, IN 46733

Part 70 Permit No.: T0015903-00031

Facility: STB7, STB8, STB9, STB10 and STB11

Parameter: Single and Combined Hazardous Air Pollutants (HAPs)

The hazardous air pollutant (HAP) input usage shall be limited such that total combined HAP emissions are limited to less than 100 tons per twelve (12) consecutive month period based on the following:

- (a) When applying gel coats and resins, hazardous air pollutant (HAPs) emissions shall be calculated by multiplying the material usage by the appropriate emission factor based on the monomer content, method of application, and other emission reduction techniques, and summing the emissions for all gel coats and resins.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors for the gel coat and resin applications shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998 (updated as the "Unified Emission Factors for Open Molding of Composites" ("CFA Factors", April 1999). For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis. Emission factors for methyl methacrylate may be obtained from the "Unified Emission Factors for Open Molding of Composites" which allows for specific emission determinations for methyl methacrylate.
- (c) When applying hazardous air pollutants (HAPs) solvents other than gel coats and resins, hazardous air pollutants (HAPs) emissions shall be calculated using an emission factor of 2,000 pounds of hazardous air pollutants (HAPs) emitted per ton of VOC used.

YEAR: _____

| Month | Combined HAPs Emitted This Month (tons) | | Combined HAPs Emitted Previous 11 Months (tons) | | Combined HAPs Emitted 12 Month Total (tons) | |
|---------|--|--|--|--|--|--|
| Month 1 | | | | | | |
| Month 2 | | | | | | |
| Month 3 | | | | | | |

- 9 No deviation occurred in this quarter.
- 9 Deviation(s) occurred in this quarter.
- 9 Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report.